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Before the
Federal Communication Commission
Washington, D.C. 20554

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In the Matter of)
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Amendment of Part 97 of the Commission's Rules) WT Docket No. 04-140
To Implement WRC-03 Regulations Applicable to)
Requirements for Operator Licenses in the)
Amateur Radio Service.

Notice of Proposed Rule Making and Order-Comments

I am AGAINST the ARRL proposal for a "Meaningful Entry-Level Privileges" under the "Novice reframing" plan effecting restricted High Frequency privileges on 80, 40 and 15 meters and a power reduction on 10 meters.

Additionally, the ARRL plan does not address the fact that the FCC has already allocated the 7.075 to 7.100 MHz segment of the 40 meter band to the "Insular Area/islands" in accordance with FCC Rules and Regulations 97. This sub band was allocated is to alleviate Amateurs in isolated areas outside the 48-states to avoid the commercial shortwave congestion above 7.100 to 7.300 MHz which emergency and/or social communications may take place.

These comments are in lock step with NPRM & O WT Docket 05-235 as put forth by the Commission.

ARRL's plan is a dumb plan will be difficult for the FCC to administer. It is my experience that Low level Technician Class licensees, generally, do not exhibit the technical expertise necessary to follow this plan and their mistakes or lack of knowledge will rain down on we higher class licensees.

I thanks the Commission for your time.

Respectfully submitted,

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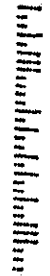
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